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December 21, 2023

By ECF

The Honorable Jessica S. Allen  
United States Magistrate Judge  
District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07102

**Re: *United States v. Scanlon*, 23 Mag. 10168 (MAH)**

Dear Judge Allen,

Please accept this letter in lieu of a formal motion on behalf of Defendant Christopher James Scanlon. We respectfully move to modify Mr. Scanlon's bail conditions to allow Mr. Scanlon to travel to the Southern District of Florida to spend the upcoming Christmas and New Year's holidays with family. Mr. Scanlon is currently subject to home confinement with electronic monitoring, and his travel is restricted to the Middle District of Florida and the District of New Jersey.

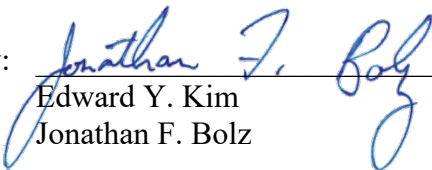
Under the proposed modification, Mr. Scanlon would drive to and remain at his grandparents' home in Port St. Lucie, Florida from December 25, 2023, through December 26, 2023, for the Christmas holiday, and from December 31, 2023, through January 1, 2024, for the New Year's holiday. A proposed order is attached.

The government, through AUSA Sophie Reiter, consents to this request. Pretrial Services is aware of this request but advised it would not consent absent a Court order given Mr. Scanlon's restrictions while on pretrial release.

We thank the Court for its time and attention to this matter.

Respectfully submitted,  
KRIEGER KIM & LEWIN LLP

By:

  
Edward Y. Kim  
Jonathan F. Bolz

December 21, 2023

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cc: All counsel of record (via ECF)  
U.S. Pretrial Services Officer Andrew Dziopa (via email)  
U.S. Pretrial Services Officer Ivette Suárez (via email)

Encl.